

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA**

Kenneth Andrew Colbaugh,	§	
Individually and as Surviving Spouse	§	
of Tabatha Marie Colbaugh	§	Case No. 1:24-cv-00151
f/k/a Tabatha Marie Smith	§	
(Deceased), JE through next friend JH	§	Hon. Clifton L. Corker
NR through next friend SR, and LC	§	Mag. Christopher H. Steger
through next friend EH,	§	
Plaintiffs,	§	
	§	
	§	
	§	
	§	
	§	
Vs.	§	
	§	
Meigs County,	§	
The Estate of Robert J. Leonard	§	
c/o Neal Pinkston Administrator	§	
Ad Litem, and John Doe 1-10	§	
Defendants.	§	

PLAINTIFF COLBAUGH’S MOTION FOR WRIT OF HABEAS CORPUS

NOW COMES PLAINTIFF KENNETH COLBAUGH, by and through his counsel, hereby moves this Honorable Court for the issuance of a Writ of Habeas Corpus to appear to testify in Court in the evidentiary hearing scheduled for November 18, 2024 in this matter pursuant to 28 U.S.C. 2254 and for reasons more fully set forth in the accompanying Brief.

Date: September 27, 2024

OLIVER BELL GROUP

/s/ Alyson Oliver

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Individually and as Surviving Spouse
of Tabatha Marie Colbaugh
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(Deceased), JE through next friend JH
NR through next friend SR, and LC
through next friend EH,
Plaintiffs,

Case No. 1:24-cv-00151

Hon. Clifton L. Corker
Mag. Christopher H. Steger

Vs.

Meigs County,
The Estate of Robert J. Leonard
c/o Neal Pinkston Administrator
Ad Litem, and John Doe 1-10
Defendants.

**PLAINTIFF COLBAUGH’S BRIEF IN SUPPORT OF MOTION FOR WRIT
OF HABEAS CORPUS**

NOW COMES PLAINTIFF KENNETH COLBAUGH, by and through his counsel, hereby moves this Honorable Court for the issuance of a Writ of Habeas Corpus to appear to testify in Court in the evidentiary hearing scheduled for November 18, 2024 in this matter pursuant to 28 USC 2241 and for reasons more fully set forth below.

Kenneth Colbaugh is currently in the custody of Meigs County and being held at the Meigs County jail at 410 River Road Decatur, TN 37322 on pending state law

charges. He is a necessary witness for the upcoming evidentiary hearing scheduled for November 18, 2024 wherein his standing in this case has been challenged.

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties that are CM/ECF participants in this action.

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